

TAB 2

From: Kevin Orsini <KOrsini@cravath.com>

Sent: Monday, July 15, 2019 6:36 PM

To: Maycon, Howard

Cc: kbaghdadi@walkuplawoffice.com; MKelly@WalkupLawOffice.com; Frank Pitre; Steve Campora; MAT[csimon@bergerkahn.com]; MAT[mgrotefeld@ghlaw-llp.com]; Shawn Caine; MAT[mochoa@ghlaw-llp.com]; MAT[wpickett@ghlaw-llp.com]

Subject: Re: North Bay and Camp Discovery

Howard,

To the extent you are asking us to consent to relief from the bankruptcy stay for any purpose, which is what your letter seems to suggest, we do not consent.

To the extent your question is whether we agree that there will need to be procedures for discovery into wildfire liability issues in the bankruptcy proceedings, then the answer is yes. We do not, however, agree that the baseline should be the outstanding requests in the state court proceedings. Those were and are overbroad, and aren't necessary for bankruptcy purposes. Since your group has moved to lift the stay related to Tubbs—which we will oppose—we think the court needs to resolve the question of how these wildfire issues will be addressed in these proceedings before we embark upon a path of discussing specific discovery demands. Once that procedural question is addressed, we anticipate that we will all need to meet and confer about specific discovery needs from both sides.

Kevin

Sent from my iPad

On Jul 12, 2019, at 2:46 PM, Maycon, Howard <HMaycon@cozen.com> wrote:

Kevin:

We provided PG&E additional time to consider stipulating to proceeding with discovery in North Bay and Camp. As we still have not received a response, we are emailing to advise that if we do not get a reply by the close of business Monday, we will proceed with the understanding that PG&E will not stipulate to any voluntary discovery and we will advise the court accordingly.

Thank you, Howard and Khaldoun

From: Kevin Orsini <KOrsini@cravath.com>
Sent: Monday, July 8, 2019 5:39 PM
To: Maycon, Howard <HMaycon@cozen.com>
Cc: kbaghdadi@walkuplawoffice.com; MKelly@WalkupLawOffice.com; Frank Pitre <FPitre@cpmlegal.com>; Steve Campora <scampora@dbbwc.com>;
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MAT[mochoa@ghlaw-llp.com] <mochoa@ghlaw-llp.com>; MAT[wpickett@ghlaw-llp.com] <wpickett@ghlaw-llp.com>
Subject: Re: North Bay and Camp Discovery

****EXTERNAL SENDER****

Howard and Khaldoun,

We are in receipt of this and are considering your position. We will be in touch soon.

Kevin

Sent from my iPad

On Jul 1, 2019, at 5:27 PM, Maycon, Howard <HMaycon@cozen.com> wrote:

Kevin:

Please find attached correspondence regarding lifting the discovery stay in the North Bay and Camp wildfires. We look forward to hearing from you by July 8, 2019.

Regards, Howard and Khaldoun



Howard D. Maycon

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<LEGAL 41767125v1 Letter to Orsini - Reopening North Bay_Camp Disco (Sent to IP_s and PE_s).pdf>

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